

**The Ad Hoc Subgroup on Data Collection
Industrial Combustion Coordinating Rulemaking
January 22 and 23, 1997**

Attendees

<u>Name</u>	<u>Affiliation</u>
Greg Adams (via telephone)	Los Angeles County Sanitation District
Sam Allen	Dow Chemical Company
Amanda Agnew	U.S. EPA
Sam Clowney	Tenneco Energy
John deRuyter	E.I. du Pont de Nemours & Co., Inc.
Jim Eddinger	U.S. EPA
Mike Gallagher	Research Triangle Institute (RTI)
Steve Gerritson	Lake Michigan Air Directors Consortium (LADCO)
Lee Gilmer	Texaco, Inc.
Reese Howle	Alpha-Gamma
Bill Maxwell	U.S. EPA
Ruth Mead	ERG
Norm Morrow	Exxon Chemical Americas
John Ogle	Dow Chemical Company
Bob Palzer	Oregon Chapter of the Sierra Club
Fred Porter	U.S. EPA
Brahim Richani	Alpha-Gamma
Sims Roy	U.S. EPA
Marv Schorr	GE Industrial and Power Systems
Mike Soots	Kincaid Furniture Company, Inc.
Joe Tessitore	Harding Lawson Associates
Mae Thomas	ERG
R. M. VanFrank	National Audubon Society

Decisions and Action Items

- The subgroup reached an agreement that a survey should be sent to fill information gaps on waste combustors. The subgroup agreed to use the EPA/state database to identify incinerators waste boilers and process heaters. These units or a sampling will be surveyed. The subgroup agreed that expertise from the Work Groups could be used to determine if there are any industries or type of incinerators, or waste boilers or process heaters that are missing from the database.
- The subgroup charged the Incinerator Work Group to take the lead in establishing a taskgroup to:

1. develop a questionnaire to survey waste-fired boilers, incinerators, and process heaters, and
2. recommend which sources in the ICCR data base to sample to fill data gaps for the various types of wastes and industries.

This taskgroup will be composed of 2 to 4 members each selected by the incinerator, boilers and process heater Work Group, and others as needed to achieve balance.

- The subgroup agreed to have one of the questions on the incinerator waste boiler and process heater survey that asks a broad question regarding whether the facility has any HAP test data from any combustion source at the facility.
- The taskgroup will submit the recommended survey to the Source Work Groups for review. After changes have been made based on Source Work Group comments, the Ad Hoc subgroup on data collection will review the survey.
- The final survey and other recommendations of this subgroup will be presented by Norm Morrow and Dr. R. VanFrank to the Coordinating Committee at the March meeting.
- The subgroup recommended that the Process Heater Work Group review the sufficiency of the EPA database for process heaters. Assuming further information is needed, the subgroup agreed to recommend to the Process Heater Work Group to encourage CMA, API, and the pulp and paper industry to develop information for their industries for process heaters. This recommendation was based on the general belief by the subgroup that classic process heaters are primarily in the petroleum refining, chemical, and pulp and paper industries.
- For each other type of possible process heaters, the subgroup recommends the Process Heater Work Group continue their effort to determine whether each SCC has been or is planned to be covered by another MACT standard, and establish a time table for completing this effort. For those types not elsewhere covered, the Work Group should recommend to the Coordinating Committee that they be covered by another MACT standard or consider whether to expand the ICCR scope.
- For turbines, engines, and fossil fuel fired boilers, the subgroup generally agreed that given the amount of data in the database and population data available from market research and previous projects, a widely distributed survey is not needed to characterize the population and develop

model plants. EPA is currently not planning to send a Section 114 Survey for turbines, engines, and fossil fuel fired boilers for population and model plant data.

- The subgroup recommends that additional questionnaires should not be sent out by Source Work Groups without coordination through the Coordinating Committee.
- The subgroup considered the questions listed on the agenda regarding the survey process.
 - Voluntary vs. Mandatory: EPA surveys will be sent out under Section 114 as mandatory. There was general agreement that the survey will accommodate voluntary effort. Once the recipient list is known, trade associations or companies could survey these if they can provide EPA sufficient assurance that the same information will be collected.
 - How will recipients be selected? From ICCR database.
 - Who will distribute? EPA will distribute section 114s. Trade associations will distribute any voluntary efforts.
 - EPA will share the recipient list with Work Groups and trade associations to avoid the same facility getting multiple surveys.
 - Who will receive responses: EPA for section 114s, trade associations for voluntary requests.
 - Who will QA/QC responses: the organization that sent out the survey will do it. However, if an association wants to assist in QA/QC of nonconfidential information from responses, EPA is open to this assistance.
 - Who will compile? In general, the organization that sends out a survey will compile it. However, EPA sees a need to have access to the raw data and a key to decode any coded data. The group discussed the possibility of using a common contractor to compile both the EPA and trade association data.
 - Who will eliminate double counts? ERG and Alpha-Gamma.
- Additional emission test data will probably need to be collected in the future. It was suggested that there may be additional existing data. Suggestions included:

- Contacting regional, State, and local offices to determine if they have toxics test reports not in STIRS.
- Trade associations asking their members
- Literature searches if source Work Groups determine these would be useful.

The EPA and Source Work Groups should review STIRS data and assess how it can be used and where there are obvious gaps. They also need to consider where test data will be most useful (e.g., for particular controls or types of units or fuels). EPA has some budget for future emission testing, but will also need to explore industry or cooperative testing efforts.